

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04 CV 10746 JLT

IVAN SANTIAGO,
Plaintiff

v.

WILLIAM J. FEENEY, MARCUS
EDDINGS, and the CITY OF BOSTON,
Defendants

DEFENDANT, CITY OF BOSTON'S
MOTION FOR SUMMARY JUDGMENT

Defendant, City of Boston ("City") respectfully requests that this Honorable Court grant summary judgment in its favor, pursuant to Fed. R. Civ. P. 56(b). As grounds for its motion, the City states that Plaintiff Ivan Santiago's constitutional rights were not violated, the Plaintiff has failed to identify a City custom or policy of deliberate indifference to the rights of its citizens, and the Plaintiff has failed to establish that the actions of the City were the moving force behind his alleged injuries.

In support of its Motion, the City submits the attached Memorandum of Law and *Local Rule 56.1 Statement of Facts and Supporting Exhibits*

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DEFENDANT REQUESTS AN ORAL ARGUMENT FOR THIS MOTION.

Respectfully submitted,
DEFENDANT, CITY OF BOSTON
Merita A. Hopkins
Corporation Counsel
By its attorney,

S/Stephen G. Cox

Stephen G. Cox BBO# 566943
Assistant Corporation Counsel
City of Boston Law Department
Room 615, Boston City Hall
Boston, Massachusetts 02201
(617) 635-4064